

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:23 MJ 119 DDN
)	
ROBERT EUTZ,)	
)	
Defendant.)	

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Jennifer Szczucinski, Assistant United States Attorneys for said District, and moves the Court to order the Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of the Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. The Defendant is charged by complaint with being a felon in possession of ammunition, in violation of 18 U.S.C. § 922(g)(1), an offense for which a maximum 15 years imprisonment is prescribed under Title 18.

2. According to the St. Louis Metropolitan Police Department and the Bureau of Alcohol, Tobacco, Firearms and Explosives, on March 30, 2023, St. Louis Metropolitan Police Department (SLMPD) officers received a call for a shooting at 3545 Lafayette, Saint Louis, Missouri. Officers arrived and located the victim, who had been shot multiple times. Officers interviewed several witnesses to the shooting. Witnesses described seeing a grey, older model

Chrysler drive down Lafayette and stop near the victim. Witnesses heard several gunshots which appeared to be fired from the Chrysler, observed the victim run, fall, and scream for help, then observed the Chrysler drive away. A witness was able to provide a partial license plate for the Chrysler, stating it was a Missouri license plate with RH2 on the license plate. One witness saw the person who shot from the Chrysler and identified the shooter as a someone the witness knew by the nickname "Trap."

3. Shortly after the shooting, SLMPD officers observed a grey, older model Chrysler with a Missouri license plate that contained RH2, in the area of Jefferson Avenue and Chouteau Avenue. Officers conducted a traffic stop and the driver and only occupant of the Chrysler, stopped the vehicle at 1820 Chouteau Avenue. The driver was identified as the Defendant. A witness was brought to the scene and identified the Defendant as the person who shot the victim. Located inside the Chrysler was a large safe and several 10mm ballistic cartridge casings and ballistic cartridges. The Defendant was in possession of over \$1,400 in cash.

4. The Defendant's criminal history reflects that he has multiple felony convictions including, but not limited to, the following:

- 2103R01825, *State of Missouri v. Robert Eutz*
Guilty Plea/Sentence Date: May 6, 2004/February 3, 2005
Count One: Stealing
Sentence: 4 year SES (following revocation)
- 1022-CR0494, *State of Missouri v. Robert Eutz*
Guilty Plea/Sentence Date: August 30, 2011
Count One: Possession of a Controlled Substance
Sentence: 4 year SES
- 1322-CR04904, *State of Missouri v. Robert Eutz*
Guilty Plea/Sentence Date: April 4, 2014
Count One: Unlawful Possession of a Firearm
Sentence: 4 year SES
- 1722-CR02028, *State of Missouri v. Robert Eutz*

Guilty Plea/Sentence Date: August 4, 2017
Count One: Resisting Arrest
Sentence: 5 year SES

5. The Defendant is on pretrial supervision in Case No. 2222-CR01886 for Trafficking Second Degree, for an arrest in February of 2022 in which the Defendant was in possession of a large quantity of fentanyl.

6. Court records reflect the Defendant has as history of violating the conditions of his probation and pretrial supervision. There is a serious risk that the Defendant will flee, given the Defendant's history of flight from law enforcement, his failure to comply with supervision while on probation and pretrial supervision, and the potential sentence the Defendant faces in this case.

7. The Defendant's criminal history and the nature and circumstances of the offense charged, reflect that there is a serious danger to the community that would be posed by the defendant's release. Further, there are no conditions or combination of conditions that will reasonably assure the Defendant's appearance as required.

WHEREFORE, the United States requests this Court to order the Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of the Defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Jennifer Szczucinski
JENNIFER SZCZUCINSKI, #56906MO
Assistant United States Attorney